

Holland N. McTyeire, V Direct (502) 587-3672 Fax (502) 540-2223 E-mail hnm@gdm.com

Via Hand Delivery

November 7, 2003

Thomas Dorman
Executive Director
Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40602-0615

Re:

In The Matter Of: Petition Of Doe Valley Utilities, Inc. For Determination As To Jurisdictional Status Of Doe Valley Utilities, Inc. And Additional Or Alternative Determinations, Case No. 2003-00360

Dear Mr. Dorman:

Enclosed for filing in the above-referenced matter are the original and ten copies of the Motion Of Doe Valley Real Estate Corporation For Full Intervention.

If you or your staff have any questions with regard to the foregoing, please do not hesitate to contact me.

Sincerely,

Holland N. McTyeire, V

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HNM/jh Enclosures

cc:

Shannon Keim James P. Panico Jeffrey A. McKenzie

LOU:827124.1

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

PETITION OF DOE VALLEY UTILITIE	ES,)	
INC. FOR DETERMINATION AS TO)	CASE NO. 2003-00360
JURISDICTIONAL STATUS OF DOE)	
VALLEY UTILITIES, INC. AND)	
ADDITIONAL OR ALTERNATIVE)	
DETERMINATIONS)	

MOTION OF DOE VALLEY REAL ESTATE CORPORATION FOR FULL INTERVENTION

Doe Valley Real Estate Corporation ("DVREC"), though counsel, hereby moves the Commission pursuant to 807 KAR 5:001 Section 3(8) for Full Intervention in the Petition Of Doe Valley Utilities, Inc. For Determination As To Jurisdictional Status Of Doe Valley Utilities, Inc. And Additional Or Alternative Determinations in the above-styled matter. The grounds in support of DVREC's Motion are set forth below.

- DVREC's participation in this matter is necessary to protect its interest as an owner of approximately 533 of the 1,183 lots in Doe Valley Subdivision located near Brandenburg in Meade County, Kentucky.
- 2. The consideration of whether Doe Valley Utilities, Inc. should be subject to regulation by the Commission impacts not only the customers outside the subdivision, who have been provided notice of this proceeding, but all those customers located within the Subdivision as well.
 - 3. DVREC's interest in this proceeding is not represented by any other party.

- 4. DVREC will likely present issues and develop facts assisting the Commission in its consideration of this matter.
- 5. DVREC's participation in this matter will not unduly complicate or disrupt this matter and will not prejudice the rights of any other party.
 - 6. DVREC's address and counsel are set forth below:

Doe Valley Real Estate Corporation 400 Lake Markham Road Sanford, Florida 32771

Holland N. McTyeire, V GREENEBAUM DOLL & McDonald PLLC 3500 National City Tower 101 South Fifth Street Louisville, Kentucky 40202 Telephone: (502) 589-4200

Facsimile: (502) 587-3695

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For the reasons set forth above, the Motion Of Doe Valley Real Estate Corporation For Full Intervention in this matter should be granted.

Respectfully submitted,

Holland N. McTyeire, V

GREENEBAUM DOLL & MCDONALD PLLC

3500 National City Tower 101 South Fifth Street

Louisville, Kentucky 40202

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<u>hnm@gdm.com</u>

COUNSEL FOR DOE VALLEY REAL ESTATE CORPORATION

CERTIFICATE OF SERVICE

I hereby certify that a copy of Motion Of Doe Valley Real Estate Corporation For Full Intervention was mailed, sufficient postage prepaid, to all participating parties of record this 7th day of November, 2003.

Randall Benham 5791 Olin Road Brandenburg, Kentucky 40108

Sharon Jones 200 Lakeshore Parkway Brandenburg, Kentucky 40108

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COUNSEL FOR DOBVALLEY REAL ESTATE CORPORATION

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